

# EXHIBIT 1

# EXHIBIT 1

**Daniel G. Chapman  
1235 N. Clybourn Avenue  
Suite A-187  
Chicago, IL 60610  
(702) 528-7374  
DGCHAP@COX.NET  
Defendant in Proper Person**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Securities and Exchange Commission, }  
Plaintiff }  
vs. }  
Exotics.Com, Inc., L. Rex Andersen, }  
Marlin R. Brinsky, Daniel G. Chapman, }  
Stephen P. Corso, Jr., Barry F. Duggan, }  
Firoz Jinnah, Ingo W. Mueller, }  
Brian K. Rabinovitz, Edward James Wexler, }  
Gary Thomas a/k/a Gary Thomas Vojtesak }  
Defendants }  
and }  
Flanagan & Associates, LTD., }  
Relief Defendant }

**DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF  
REQUESTS FOR ADMISSION TO PLAINTIFF SECURITIES  
AND EXCHANGE COMMISSION**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure (“FRCP”), Defendant Daniel G. Chapman hereby requests that Plaintiff, Securities and Exchange Commission, admit the truthfulness of the facts set forth below no later than thirty (30) days after service.

## DEFINITIONS

1. The terms "YOU" and "YOUR", together with any variations of those terms, refer to the Plaintiff, Securities and Exchange Commission, and any of its agents, employees, attorneys, or representatives.

1       2.       The term “MANIPULATION DEFENDANT” shall have the meaning  
2                   attributed to it in the COMPLAINT.

3       3.       The term “COMPLAINT” refers to the Complaint in the above-captioned  
4                   case, filed by you on or about April 25, 2005.

5                   **REQUESTS FOR ADMISSION**

6       **Request for Admission #1:** Admit that Mr. Chapman had no involvement in any of the  
7                   activities described in paragraph 24 of the Complaint.

8       **Request for Admission #2:** Admit that Mr. Chapman had no involvement in any of the  
9                   activities described in paragraph 27 of the Complaint.

10      **Request for Admission #3:** Admit that Mr. Chapman had no involvement in preparing  
11                   any of the several allegedly “false Commission filings” described in paragraph 28 of the  
12                   Complaint.

13      **Request for Admission #4:** Admit that Mr. Chapman had no involvement in preparing  
14                   or disseminating the March 19, 2001 press release described in paragraph 37 of the  
15                   Complaint.

16      **Request for Admission #5:** Admit that Mr. Chapman had no involvement in any of the  
17                   allegedly manipulative trading described in paragraphs 43-45 of the Complaint.

18      **Request for Admission #6:** Admit that Mr. Chapman had no involvement in any of the  
19                   allegedly manipulative trading described in paragraphs 46-49 of the Complaint.

20      **Request for Admission #7:** Admit that Mr. Chapman had no involvement in preparing  
21                   or disseminating any of the alleged spams described in paragraphs 50-56 of the Complaint.

22      **Request for Admission #8:** Admit that Mr. Chapman had no involvement in any of the  
23                   activities described in paragraphs 57-66 of the Complaint.

24      **Request for Admission #9:** Admit that Mr. Chapman had no involvement in preparing  
25                   the Amended Form 8-K described in paragraphs 67-70 of the Complaint.

1           **Request for Admission #10:** Admit that Mr. Chapman had no involvement in  
2 preparing the 2001 Third Quarter Form 10-QSB described in paragraphs 71-76 of the  
3 Complaint.

4           **Request for Admission #11:** Admit that Mr. Chapman had no involvement in any of  
5 the activities described in paragraphs 77-79 of the Complaint.

6           **Request for Admission #12:** Admit that Mr. Chapman had no involvement in  
7 preparing the 2001 Form 10-KSB described in paragraphs 80-82 of the Complaint.

8           **Request for Admission #13:** Admit that Mr. Chapman had no involvement in the  
9 activities described in paragraphs 83-84 of the Complaint.

10           **Request for Admission #14:** Admit that Mr. Chapman had no involvement in the  
11 activities described in paragraphs 85-88 of the Complaint.

12           Dated: October 16, 2008



15           Daniel G. Chapman  
16           1235 N. Clybourn Avenue  
17           Suite A-187  
18           Chicago, IL 60610  
19           Defendant In Proper Person

20

21

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23

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on this 16th day of October, 2008, I forwarded a true and correct  
3 copy of the foregoing DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF  
4 REQUESTS FOR ADMISSION TO PLAINTIFF SECURITIES AND EXCHANGE  
5 COMMISSION by email to the following:

6 Silvestre A. Fontes, Esq. Sean T. Prosser, Esq.  
7 [fontess@sec.gov](mailto:fontess@sec.gov) [sprosser@mofo.com](mailto:sprosser@mofo.com)

8 Thomas J. Rappaport, Esq. David London, Esq.  
9 [rappaport@sec.gov](mailto:rappaport@sec.gov) [longond@sec.gov](mailto:longond@sec.gov)

10 Robert D. O'Connor, Esq. Britt Collins, Esq.  
11 [oconnord@sec.gov](mailto:oconnord@sec.gov) [collinsb@sec.gov](mailto:collinsb@sec.gov)

12 Blaine T. Welsh, Esq. Tyson E. Marshall, Esq.  
13 [Blaine.Welsh@usdoj.gov](mailto:Blaine.Welsh@usdoj.gov) [tmarshall@mofo.com](mailto:tmarshall@mofo.com)

14 David J. Merrill, Esq. James N. Barber, Esq.  
15 [dmerrill@baileykennedy.com](mailto:dmerrill@baileykennedy.com) [barber.jn@comcast.net](mailto:barber.jn@comcast.net)

16 Donald J. Christie, Esq. Kelly O. Slade, Esq.  
17 [donchristie@aol.com](mailto:donchristie@aol.com) [kslade@embarqmail.com](mailto:kslade@embarqmail.com)

18 Thomas W. Davis, II, Esq. O. Robert Meridith, Esq.  
19 [twd@h2law.com](mailto:twd@h2law.com) [Robert@meredithlaw.com](mailto:Robert@meredithlaw.com)

20 David A. Zisser Sean P. Flanagan  
21 [dzisser@ir-law.com](mailto:dzisser@ir-law.com) [grumpysean@yahoo.com](mailto:grumpysean@yahoo.com)

22 And mailed by first class mail, postage prepaid, to the following:

23  
24 Mr. James L. Ericksteen  
25 Apt. 1502  
26 1228 West Hastings Street  
27 Vancouver, B.C. V6E 4S6

28 Dated: October 16, 2008

29  
30 

31 Daniel G. Chapman  
32 1235 N. Clybourn Avenue  
33 Suite A-187  
34 Chicago, IL 60610

# EXHIBIT 2

# EXHIBIT 2

**Daniel G. Chapman  
1235 N. Clybourn Avenue  
Suite A-187  
Chicago, IL 60610  
(702) 528-7374  
DGCHAP@COX.NET  
Defendant in Proper Person**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Securities and Exchange Commission, }  
Plaintiff }  
vs. }  
Exotics.Com, Inc., L. Rex Andersen, }  
Marlin R. Brinsky, Daniel G. Chapman, }  
Stephen P. Corso, Jr., Barry F. Duggan, }  
Firoz Jinnah, Ingo W. Mueller, }  
Brian K. Rabinovitz, Edward James Wexler, }  
Gary Thomas a/k/a Gary Thomas Vojtesak }  
Defendants }  
and }  
Flanagan & Associates, LTD., }  
Relief Defendant }

**DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF  
INTERROGATORIES TO PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure (“FRCP”), Defendant Daniel G. Chapman hereby propounds this first set of Interrogatories to Plaintiff Securities and Exchange Commission. Plaintiff should respond separately and fully, in writing and under oath, to each of the following Interrogatories no later than thirty (30) days after service.

## INSTRUCTIONS

Please use these Instructions and the Definitions that follow in answering the Interrogatories. If you find the meaning of any term in these Interrogatories to be unclear, you shall assume a reasonable meaning, state what the assumed meaning is, and respond to

1 the Interrogatory according to the assumed meaning. If no pleading or other paper is  
2 specified, references to "paragraph \_\_\_\_" refer to the numbered paragraph in the  
3 COMPLAINT (as defined below). If a specific pleading or other paper is specified, a  
4 reference to "paragraph \_\_\_\_" refers to the numbered paragraph in that pleading or paper. If  
5 the response to the Interrogatory may be answered by referring to a DOCUMENT (as defined  
6 below), or is supported by a DOCUMENT, the DOCUMENT shall be attached as an exhibit  
7 to the response and referred to in the response, with reference to the page and section where  
8 the answer to the Interrogatory can be found.

## 9 **DEFINITIONS**

10 4. The term "IDENTIFY" when used with respect to an individual, means to  
11 state the name, title, and business address of the individual so identified. When used  
12 with respect to a business entity, the term "IDENTIFY" means to state the legal name  
13 of the entity, together with its business address, state of incorporation or other such  
14 organization, and the name and business address of its registered agent in the State of  
15 Nevada. When used with respect to an AGENCY, the term "IDENTIFY" means to  
16 state the name of the AGENCY, the unit within such AGENCY, if applicable, and the  
17 business address of the AGENCY. When used with respect to EVIDENCE, the term  
18 "IDENTIFY" shall include a description of the item of EVIDENCE, the subject  
19 matter or nature of the item, its date of production, and its dates of uses, together with  
20 the name of the person who signed it or under whose name it was issued, its author(s),  
21 its addressee(s) and recipient(s), its present or last known custodian, and the name of  
22 the individual who will be called upon at trial with respect to that item.

23 5. The term "EVIDENCE" shall have the broadest possible meaning as permitted  
24 by the FRCP and the Federal Rules of Evidence. It includes DOCUMENTS, items of  
25 EVIDENCE, case law, statutes, regulations, and testimony to be presented at trial.

26 6. The term "DOCUMENT" shall have the broadest possible meaning as  
27 permitted by Rules 26 and 34 of the FRCP and relevant case law, and includes written  
agreements, responses to discovery, including transcripts of depositions, together with

1 any other “writings,” “recordings,” and “photographs,” as defined by the Federal  
2 Rules of Evidence. “DOCUMENTS” shall also include materials stored electronically  
3 or electromagnetically (e.g., electronic mail) and all drafts or other non-final versions,  
4 alterations, modifications and amendments to any of the foregoing.

5 7. The terms “YOU” and “YOUR”, together with any variations of those terms,  
6 refer to the Plaintiff, Securities and Exchange Commission, and any of its agents,  
7 employees, attorneys, or representatives.

8 8. The term “AGENCY” means any federal or state governmental agency,  
9 commission, or other such governmental entity, and includes any unit and/or subunit  
10 within such entity.

11 9. The term “COMPLAINT” refers to the Complaint in the above-captioned  
12 case, filed by YOU on or about April 25, 2005.

13 10. The term “MANIPULATION DEFENDANT” shall have the meaning  
14 attributed to it in the COMPLAINT.

15 11. The term “COMMUNICATION” means and includes, without limitation, any  
16 meeting, discussion, contact, conference, telephone conversation, letter, e-mail  
17 transmission, Internet posting, memorandum, message, telegram, telefax, mailgram,  
18 billing statement, xerographic transmission, or any electronic recording or other form  
19 of written or oral information transmission or exchange. Any Interrogatory seeking  
20 information relating in any way to communications to, from, or within any AGENCY,  
21 business and/or corporate entity includes all communications by and between any  
22 officers, directors, agents, employees, representatives, and/or attorneys of that entity.

23 12. The term “REQUEST FOR ADMISSION” refers to Defendant Daniel G.  
24 Chapman’s First Set Of Requests For Admission To Plaintiff Securities And  
25 Exchange Commission.

## INTERROGATORIES

**Interrogatory #1:** Please IDENTIFY all EVIDENCE upon which YOU intend to rely at trial to support YOUR assertion in Paragraph 90 of the COMPLAINT that Mr. Chapman violated Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

**Interrogatory #2:** Please IDENTIFY all EVIDENCE upon which YOU intend to rely at trial to support YOUR assertion in Paragraph 90 of the COMPLAINT that Mr. Chapman acted intentionally, knowingly or recklessly in violating Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

**Interrogatory #3:** Please IDENTIFY all of the EVIDENCE upon which YOU intend to rely at trial to support YOUR allegation in Paragraph 91 of the COMPLAINT that Mr. Chapman, unless enjoined, will continue to violate Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

**Interrogatory #4:** Please IDENTIFY all of the EVIDENCE upon which YOU intend to rely at trial to support YOUR assertion in Paragraph 107 of the COMPLAINT that Mr. Chapman knew or was reckless in not knowing, that the conduct of all of the other MANIPULATION DEFENDANTS in the alleged manipulation scheme was improper, and that he knowingly and substantially assisted the MANIPULATION DEFENDANTS' violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

**Interrogatory #5:** Please IDENTIFY all of the EVIDENCE upon which YOU intend to rely at trial to support YOUR allegation in Paragraph 113 of the COMPLAINT that Mr. Chapman, unless enjoined, will continue to aid and abet the Manipulation Defendants' violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

**Interrogatory #6:** Please IDENTIFY all of the alleged “ill-gotten gains” that YOU are asking Mr. Chapman to disgorge in Paragraph VII of the Prayer for Relief section of the COMPLAINT.

**Interrogatory #7:** Please IDENTIFY all COMMUNICATIONS that YOU have had with other AGENCIES, including but not limited to, the United States Department of Justice,

1 and the Office of the United States Attorney for the District of Nevada concerning Mr.  
2 Chapman.

3 **Interrogatory #8:** Please IDENTIFY all COMMUNICATIONS that YOU have had  
4 with any other individuals or entities concerning Mr. Chapman in connection with any other  
5 legal actions in which Mr. Chapman was a party.

6 **Interrogatory #9:** Please describe, in detail, and concerning Mr. Chapman's  
7 involvement with the preparation of false and misleading books and records or public  
8 announcements as alleged in Paragraph 2 of the COMPLAINT. Include in your response the  
9 dates on which each of these false and misleading items were filed, released or otherwise  
10 disseminated.

11 **Interrogatory #10:** Please describe, in detail, and IDENTIFY all  
12 COMMUNICATIONS concerning any and all of the "respects" in which fraudulent trading  
13 activities were coordinated out of the law firm of Chapman and Flanagan, Ltd, as alleged in  
14 Paragraph 3 of the COMPLAINT. Include in YOUR response the dates on which each of  
15 these coordinated activities took place.

16 **Interrogatory #11:** Please describe, in detail, and IDENTIFY all  
17 COMMUNICATIONS concerning Mr. Chapman's participation in the manipulative trading  
18 portion of the manipulation scheme alleged in Paragraph 3 of the COMPLAINT. Include in  
19 YOUR response the dates on which each of these manipulative trades took place.

20 **Interrogatory #12:** Please describe, in detail, and IDENTIFY all  
21 COMMUNICATIONS concerning Mr. Chapman's participation in the dissemination of the  
22 false press release, e-mail and fax spams which are alleged in Paragraph 3 of the  
23 COMPLAINT to have been part of the manipulation scheme. Include in YOUR response the  
24 dates on which each of these releases/spams were distributed.

25 **Interrogatory #13:** Please IDENTIFY all of the EVIDENCE upon which YOU intend  
26 to rely at trial to support YOUR allegation in Paragraph 23 of the COMPLAINT that Mr.  
27 Chapman arranged for Ingo Mueller, as an individual, to acquire Hardrock. In particular,  
describe all of Mr. Chapman's activities, and the dates on which these activities occurred.

1                   **Interrogatory #14:** Please IDENTIFY all of the EVIDENCE upon which YOU intend  
2 to rely at trial to support YOUR allegation in Paragraphs 33, 41, and 42 of the COMPLAINT,  
3 and in open court on August 19, 2008, that Mr. Chapman sold any of the stock in the escrow  
4 brokerage account. In particular, describe all of Mr. Chapman's activities, and the dates on  
5 which these activities occurred.

6                   **Interrogatory #15:** Please IDENTIFY all of the EVIDENCE upon which YOU intend  
7 to rely at trial to support YOUR allegation made in open court on August 19, 2008 that the  
8 escrow brokerage account was the property of Mr. Chapman or the law firm of Chapman &  
9 Flanagan, Ltd.

10                  **Interrogatory #16:** Please IDENTIFY all of the EVIDENCE upon which YOU intend  
11 to rely at trial to support YOUR allegation in Paragraphs 31 and 32 of the COMPLAINT, and  
12 in open court on August 19, 2008, that the shares of Exotics-Nevada needed to be registered  
13 prior to being re-issued and distributed.

14                  **Interrogatory #17:** For each REQUEST FOR ADMISSION for which your response is  
15 anything other than an unqualified admission, please IDENTIFY all EVIDENCE upon which  
16 YOU intend to rely at trial to support YOUR response.

17                  Dated: October 16, 2008



20                  Daniel G. Chapman  
21                  1235 N. Clybourn Avenue  
22                  Suite A-187  
23                  Chicago, IL 60610  
24                  Defendant In Proper Person

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26  
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## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2008, I forwarded a true and correct copy of the foregoing DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF INTERROGATORIES TO PLAINTIFF SECURITIES AND EXCHANGE COMMISSION by email to the following:

Silvestre A. Fontes, Esq.  
[fontess@sec.gov](mailto:fontess@sec.gov)

Thomas J. Rappaport, Esq.  
rappaportt@sec.gov

Robert D. O'Connor, Esq.  
[oconnord@sec.gov](mailto:oconnord@sec.gov)

Blaine T. Welsh, Esq.  
[Blaine.Welsh@usdoj.gov](mailto:Blaine.Welsh@usdoj.gov)

Tyson E. Marshall, Esq.  
[tmarshall@mofo.com](mailto:tmarshall@mofo.com)

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Thomas W. Davis, II, Esq.  
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[Robert@meredithlaw.com](mailto:Robert@meredithlaw.com)

David A. Zisser  
dzipper@ir-law.com

Sean P. Flanagan  
grumpysean@yahoo.com

And mailed by first class mail, postage prepaid, to the follow

Mr. James L. Ericksteen  
Apt. 1502  
1228 West Hastings Street  
Vancouver, B.C. V6E 4S6

Dated: October 16, 2008

Daniel G. Chapman  
1235 N. Clybourn Avenue  
Suite A-187  
Chicago, IL 60610

# EXHIBIT 3

# EXHIBIT 3

**Daniel G. Chapman  
1235 N. Clybourn Avenue  
Suite A-187  
Chicago, IL 60610  
(702) 528-7374  
DGCHAP@COX.NET  
Defendant in Proper Person**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Securities and Exchange Commission, }  
Plaintiff }  
vs. }  
Exotics.Com, Inc., L. Rex Andersen, }  
Marlin R. Brinsky, Daniel G. Chapman, }  
Stephen P. Corso, Jr., Barry F. Duggan, }  
Firoz Jinnah, Ingo W. Mueller, }  
Brian K. Rabinovitz, Edward James Wexler, }  
Gary Thomas a/k/a Gary Thomas Vojtesak }  
Defendants }  
and }  
Flanagan & Associates, LTD., }  
Relief Defendant }

**DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
PLAINTIFF SECURITIES AND EXCHANGE COMMISSION**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Daniel G. Chapman hereby requests that Plaintiff Securities and Exchange Commission produce the following DOCUMENTS and materials for copying and inspection at 1235 N. Clybourn Avenue, Suite A-187, Chicago, IL 60610, no later than thirty (30) days after service.

## INSTRUCTIONS

A. These Requests apply to all DOCUMENTS in YOUR possession, custody, or control, regardless of the location of the DOCUMENT, and include all drafts or copies of such DOCUMENTS that differ in any respect from the original, whether

1 because of handwritten notations or otherwise. If any existing DOCUMENT  
2 responsive to these Requests was, but no longer is, in YOUR possession, custody or  
3 control, identify that DOCUMENT and the PERSON who now has possession,  
4 custody or control of such DOCUMENT.

5 B. Produce all DOCUMENTS as they were kept in the ordinary course of  
6 business. Any DOCUMENT responsive to any Request for production listed below  
7 must be provided in its entirety, including all attachments and enclosures.  
8 DOCUMENTS that are in file folders or enclosures shall be produced in such form  
9 and shall indicate the PERSON from whose files each DOCUMENT was produced. If  
10 copies are made of DOCUMENTS with notes attached on the front or back via  
11 adhesive or the like, they shall be produced both with and without the attached  
12 adhesive notes.

13 C. In the event that any DOCUMENT called for by these Requests is to be  
14 withheld on the basis of a claim of privilege, that DOCUMENT is to be identified by  
15 stating: i) any addresser and/or addressee, ii) all recipients of copies, iii) the  
16 DOCUMENT's date, subject matter, number of pages, and any attachments or  
17 appendices, iv) all PERSONS to whom the DOCUMENT was distributed, shown, or  
18 explained, v) its present custodian, and vi) the nature of the privileges asserted.

19 D. In the event that any DOCUMENT called for by these Requests or any  
20 subsequent Requests has been destroyed or discarded, that DOCUMENT is to be  
21 identified by stating: i) any addresser and/or addressee, ii) all recipients of copies, iii)  
22 the DOCUMENT's date, subject matter, number of pages, and any attachments or  
23 appendices, iv) all PERSONS to whom the DOCUMENT was distributed, shown, or  
24 explained, v) the date and manner of, and reason for, destruction or discard, vi) the  
25 PERSONS who are authorized to carry out such destruction or discard, and vii)  
26 whether any copies of the DOCUMENT presently exist and, if so, the name and  
27 current or last known address of the custodian of each copy.

E. These Requests shall be deemed continuing so as to require further and supplemental production in accordance with the Federal Rules of Civil Procedure.

F. If YOU find the meaning of any term in these Requests to be unclear, YOU shall assume a reasonable meaning, state what the assumed meaning is, and respond to the Request according to the assumed meaning.

## DEFINITIONS

13. The conjunctive term "AND" shall include the disjunctive term "OR" and vice versa, as necessary to make the Request in which it is used inclusive rather than exclusive; the singular shall include the plural, and vice versa; a feminine pronoun shall include the masculine and neuter pronoun, and vice versa; the use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of the Request in which it is used DOCUMENTS that might otherwise be construed as outside its scope.

14. The term "COMMUNICATION" means and includes, without limitation, any meeting, discussion, contact, conference, telephone conversation, letter, e-mail transmission, Internet posting, memorandum, message, telegram, telefax, mailgram, billing statement, xerographic transmission, or any electronic recording or other form of written or oral information transmission or exchange. Any Request seeking information relating in any way to communications to, from, or within a business and/or corporate entity includes all communications by and between any officers, directors, agents, employees, representatives, and/or attorneys of the business and/or corporate entity.

15. The term “DOCUMENT” shall have the broadest possible meaning as permitted by Rules 26 and 34 of the FRCP and relevant case law, and includes COMMUNICATIONS as well as “writings,” “recordings,” and “photographs,” as defined by Federal Rules of Evidence. “DOCUMENTS” shall also include materials stored electronically or electromagnetically (e.g., electronic mail) and all drafts or

1 other non-final versions, alterations, modifications and amendments to any of the  
2 foregoing.

3 16. The terms “YOU” and “YOUR”, together with any variations of those terms,  
4 refer to the Plaintiff Securities and Exchange Commission, and any of its agents,  
5 employees, attorneys, or other representatives.

6 17. The word “INCLUDING” is intended to be comprehensive and means  
7 “including but not limited to.”

8 18. The term “PERSON” means any natural person, association, limited liability  
9 company, partnership, or corporation.

10 19. The phrase “RELATING TO” or “IN RELATION TO” shall be construed in  
11 its broadest sense to require information or DOCUMENTS which constitute, concern,  
12 pertain to, mention, evidence, describe, discuss, refer to (directly or indirectly),  
13 reflect, comment upon or summarize the subject of any particular Request for  
14 DOCUMENTS.

#### 15 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

16 **Request for Production #1:** Produce all DOCUMENTS identified in YOUR response  
17 to Interrogatory #1 of Defendant Daniel G. Chapman’s First Set of Interrogatories to Plaintiff  
18 Securities and Exchange Commission.

19 **Request for Production #2:** Produce all DOCUMENTS identified in YOUR response  
20 to Interrogatory #2 of Defendant Daniel G. Chapman’s First Set of Interrogatories to Plaintiff  
21 Securities and Exchange Commission.

22 **Request for Production #3:** Produce all DOCUMENTS identified in YOUR response  
23 to Interrogatory #3 of Defendant Daniel G. Chapman’s First Set of Interrogatories to Plaintiff  
24 Securities and Exchange Commission.

25 **Request for Production #4:** Produce all DOCUMENTS identified in YOUR response  
26 to Interrogatory #4 of Defendant Daniel G. Chapman’s First Set of Interrogatories to Plaintiff  
27 Securities and Exchange Commission.

1       **Request for Production #5:** Produce all DOCUMENTS identified in YOUR response  
2 to Interrogatory #5 of Defendant Daniel G. Chapman's First Set of Interrogatories to Plaintiff  
3 Securities and Exchange Commission.

4       **Request for Production #6:** Produce all DOCUMENTS that support YOUR response  
5 to Interrogatory #6 of Defendant Daniel G. Chapman's First Set of Interrogatories to Plaintiff  
6 Securities and Exchange Commission.

7       **Request for Production #7:** Produce all DOCUMENTS identified in YOUR response  
8 to Interrogatory #7 of Defendant Daniel G. Chapman's First Set of Interrogatories to Plaintiff  
9 Securities and Exchange Commission.

10       **Request for Production #8:** Produce all DOCUMENTS identified in YOUR response  
11 to Interrogatory #8 of Defendant Daniel G. Chapman's First Set of Interrogatories to Plaintiff  
12 Securities and Exchange Commission.

13       **Request for Production #9:** Produce all DOCUMENTS that support YOUR response  
14 to Interrogatory #9 of Defendant Daniel G. Chapman's First Set of Interrogatories to Plaintiff  
15 Securities and Exchange Commission.

16       **Request for Production #10:** Produce all DOCUMENTS that support YOUR response  
17 to Interrogatory #10 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
18 Plaintiff Securities and Exchange Commission.

19       **Request for Production #11:** Produce all DOCUMENTS that support YOUR response  
20 to Interrogatory #11 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
21 Plaintiff Securities and Exchange Commission.

22       **Request for Production #12:** Produce all DOCUMENTS that support YOUR response  
23 to Interrogatory #12 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
24 Plaintiff Securities and Exchange Commission.

25       **Request for Production #13:** Produce all DOCUMENTS identified in YOUR response  
26 to Interrogatory #13 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
27 Plaintiff Securities and Exchange Commission.

1                   **Request for Production #14:** Produce all DOCUMENTS identified in YOUR response  
2 to Interrogatory #14 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
3 Plaintiff Securities and Exchange Commission.

4                   **Request for Production #15:** Produce all DOCUMENTS identified in YOUR response  
5 to Interrogatory #15 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
6 Plaintiff Securities and Exchange Commission.

7                   **Request for Production #16:** Produce all DOCUMENTS identified in YOUR response  
8 to Interrogatory #16 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
9 Plaintiff Securities and Exchange Commission.

10                  **Request for Production #17:** Produce all DOCUMENTS identified in YOUR response  
11 to Interrogatory #17 of Defendant Daniel G. Chapman's First Set of Interrogatories to  
12 Plaintiff Securities and Exchange Commission.

13                  Dated: October 16, 2008



16                  Daniel G. Chapman  
17                  1235 N. Clybourn Avenue  
18                  Suite A-187  
19                  Chicago, IL 60610  
20                  Defendant In Proper Person

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## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2008, I forwarded a true and correct copy of the foregoing DEFENDANT DANIEL G. CHAPMAN'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF SECURITIES AND EXCHANGE COMMISSION by email to the following:

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